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Attorney for Interested Parties Lena Evans, Roni Shemtov, and Shbadan Akylbekov

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN JOSE DIVISION**

LENA EVANS, RONI SHEMTOV, and  
SHBADAN AKYLBKOV, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

PAYPAL, INC., a Delaware corporation; and  
DOES 1-25, inclusive,  
Defendants.

Case No.: 5:22-cv-00248-BLF

**STIPULATION TO EXTEND TIME TO  
RESPOND TO THE MOTION TO  
COMPEL ARBITRATION**

Date Action Filed: January 13, 2022

The Parties, Plaintiffs Lena Evans, Roni Shemtov, and Shbadan Akylbekov (“Plaintiffs”) and Defendant PayPal, Inc. (“Defendant”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Paypal filed a Motion to Compel Arbitration (the “Motion” herein) on March 16, 2022, as Docket No. 20;

1 WHEREAS, the Motion is set for hearing on May 26, 2022, at 9:00 am San Jose,  
2 Courtroom 3, 5th Floor before Judge Beth Labson Freeman;

3 WHEREAS, Plaintiffs' opposition to the Motion is due on March 30, 2022,

4 WHEREAS, PayPal's reply is currently due on April 6, 2022,

5  
6 WHEREAS, under Civil Local Rules 6-1(b) and 6-2, as well as pursuant to this Court's  
7 Standing Order, parties may stipulate in writing to and request Court approval of a briefing  
8 schedule that differs from that set forth by the Court's Civil Local Rules; and

9 WHEREAS extending the dates as set forth below will not prejudice any party or affect  
10 any other dates set forth by the Court;

11  
12 WHEREAS the reasons for the extension are the complexity and number of issues raised  
13 by the Motion necessitating increased research and drafting, as well as, the availability of  
14 counsel during this time.

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1           THEREFORE, the Parties have conferred and agree to extend the time for Plaintiffs'  
2 opposition to April 22, 2022, and for PayPal's reply to May 10, 2022.

3           **IT IS SO STIPULATED.**  
4

5           Dated March 24, 2022

By: /s/Eric Bensamochan, Esq.  
Ean Matthew Schreiber  
Eric Andrew Schreiber  
Eric Bensamochan, Esq.  
Counsel for Plaintiffs

9           Dated March 24, 2022

By: /s/Judith Shophet Sidkoff  
Judith Shophet Sidkoff  
Attorneys for Defendant  
PAYPAL, INC.,

12           **PURSUANT TO STIPULATION, IT IS SO ORDERED**

14           Dated:   March 24, 2022

By:   
Judge Beth Labson Freeman

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DOES 1-25, inclusive,  
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Case No.: 5:22-cv-00248-BLF

**DECLARATION OF ERIC  
BENSAMOCHAN IN SUPPORT OF THE  
STIPULATION TO EXTEND TIME TO  
RESPOND TO THE MOTION TO  
COMPEL ARBITRATION**

Date Action Filed: January 13, 2022

I, Eric Bensamochan, do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am an attorney licensed to practice law in the State of California and in the United States District Court for the Central District of California, and am counsel for Plaintiffs in

1 this matter. As such, I have personal knowledge of the following facts and could competently  
2 testify thereto in a court of law.

3 2. This case was initiated by the filing of the complaint on January 13, 2022.

4 3. The parties previously stipulated to an extension of time to file an answer from  
5 February 14, 2022, to March 16, 2022. That stipulation was filed on February 4, 2022, as Docket  
6 Number 11.

7 4. That the parties have stipulated to extend the time to file the response and reply to  
8 Defendant's Motion to Compel Arbitration as set forth in the attached stipulation.

9 5. That the reasons for the extension are the complexity and number of issues raised  
10 by the Motion necessitating increased research and drafting, as well as, the availability of  
11 counsel during this time.

12 6. That the stipulated extension will not greatly effect the timeline of this case as the  
13 requested time is only a matter of a couple weeks.

14 I declare under penalty of perjury under the laws of the State of California and under the  
15 laws of the United States of America that the foregoing is true and correct.

16 Executed this 23rd day of March 2022, at Beverly Hills, California.

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19 /s/Eric Bensamochan  
Eric Bensamochan, Esq.  
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